

IN THE DISTRICT COURT OF THE UNITED STATES
for the Western District of New York

JULY 2023 GRAND JURY
(Impaneled 07/28/2023)

THE UNITED STATES OF AMERICA

INDICTMENT

-VS-

PAUL J. RASLAWSKY a/k/a “PJ”

Violations:
Title 18, United States Code,
Sections 922(g)(3) and 924(a)(8)
(2 Counts and Forfeiture Allegation)

COUNT 1

(Unlawful User of a Controlled Substance in Possession of Firearms)

The Grand Jury Further Charges That:

On or about March 1, 2021, in the Western District of New York, the defendant, **PAUL J. RASLAWSKY a/k/a “PJ”**, knowing that he was an unlawful user of a controlled substance as defined in Title 21, United States Code, Section 802, did knowingly possess, in and affecting commerce, firearms, namely one (1) Savage Arms, .17 caliber, Model 93R17, .17 H.M.R. Caliber Blot Action Rifle, bearing serial number 1095778; one (1) Savage Arms, Model 110 rifle, 7MM REM MAG bolt action rifle, bearing serial number F738414; one (1) Savage Arms, 308 WIN caliber bolt action rifle, Model Axis, bearing serial number H173090; one (1) Ithaca Gun Co. Inc., by SKB, Model 300, 20 gauge semi-automatic shotgun, bearing serial number S510088; and one (1) American Tactical Importers Inc., Model Omni Hybrid, multi caliber semi-automatic rifle, bearing serial number NS089343.

All in violation of Title 18, United States Code, Sections 922(g)(3) and 924(a)(2).

COUNT 2

(Unlawful User of a Controlled Substance in Possession of Ammunition)

The Grand Jury Further Charges That:

On or about December 8, 2023, in the Western District of New York, the defendant, **PAUL J. RASLAWSKY a/k/a “PJ”**, knowing that he was an unlawful user of a controlled substance as defined in Title 21, United States Code, Section 802, did knowingly possess, in and affecting commerce, ammunition, namely seventeen (17) PMC 7MM MAUSER caliber rounds of ammunition labeled “PMC 7MM MAUSER” on the headstamp; one (1) F.M.G. 7MM MAUSER caliber round of ammunition labeled “F.M.G. 19 76 CHILE” on the headstamp; twenty-one (21) Sellier & Bellot 7 x 57 caliber rounds of ammunition labeled “S&B 7x57” on the headstamp; nineteen (19) NNY 7 x 57 caliber rounds of ammunition labeled “NNY 7x57” on the headstamp; and six (6) FEDERAL 38 SPL + P caliber rounds of ammunition labeled “FEDERAL 38 SPL+P” on the headstamp.

All in violation of Title 18, United States Code, Sections 922(g)(3) and 924(a)(8).

FORFEITURE ALLEGATION

The Grand Jury Alleges That:

Upon conviction of any and all Counts of this Indictment, the defendant, **PAUL J. RASLAWSKY a/k/a “PJ”**, shall forfeit to the United States, all his right, title and interest in any firearm and ammunition involved or used in the commission of the offenses, or found in the possession or under the immediate control of the defendant, including but not limited to the following property:

FIREARMS AND AMMUNITION:

- a. Black American Tactical Importers, Inc., model Omni Hybrid, multi caliber semi-automatic rifle, bearing serial number NS089343, seized on or about March 1, 2021, from 19 Gratton Street, Buffalo, New York;
- b. Savage Arms, .17 caliber, Model 93R17, .17 H.M.R. Caliber Blot Action Rifle, bearing serial number 1095778, seized on or about March 1, 2021, from 19 Gratton Street, Buffalo, New York;
- c. Ithaca Gun Co., Inc., by SKB, Model 300, 20-gauge semi-automatic shotgun, bearing serial number S510088, seized on or about March 1, 2021, from 19 Gratton Street, Buffalo, New York;
- d. Savage Arms, 308 WIN caliber bolt action rifle, Model Axis, bearing serial number H173090, seized on or about March 2, 2021, from 43 Longnecker Street, Buffalo, New York;
- e. Savage Arms, 7MM REM MAG bolt action rifle, bearing serial number F738414, seized on or about March 2, 2021, from 43 Longnecker Street, Buffalo, New York;
- f. Seventeen (17) PMC 7MM MAUSER caliber rounds of ammunition labeled "PMC 7MM MAUSER" on the headstamp;
- g. One (1) F.M.G. 7MM MAUSER caliber round of ammunition labeled "F.M.G. 19 76 CHILE" on the headstamp;
- h. Twenty-one (21) Sellier & Bellot 7 x 57 caliber rounds of ammunition labeled "S&B 7x57" on the headstamp;
- i. Nineteen (19) NNY 7 x 57 caliber rounds of ammunition labeled "NNY 7x57" on the headstamp; and
- j. Six (6) FEDERAL 38 SPL + P caliber rounds of ammunition labeled "FEDERAL 38 SPL+P" on the headstamp.

All pursuant to Title 18, United States Code, Sections 924(d)(1) and 3665, and Title 28, United States Code, Section 2461(c).

DATED: Buffalo, New York, March 6, 2024

TRINI E. ROSS
United States Attorney

BY: S/ LOUIS A. TESTANI
LOUIS A. TESTANI
Assistant United States Attorney
United States Attorney's Office
Western District of New York
138 Delaware Avenue
Buffalo, New York 14202
716-843-5894
Louis.Testani@usdoj.gov

A TRUE BILL:

S/ FOREPERSON
FOREPERSON